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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

In re: Zytiga Litigation

Master Docket. No. 19-12107 (KM)(ESK)
Hon. Kevin McNulty, U.S.D.J.
Hon. Edward S. Kiel, U.S.M.J.

This Document Relates To: All Actions

Motion Day: May 18, 2021
(Oral Argument Requested)

**NOTICE OF JOINT MOTION TO STAY
DISCOVERY BY ALL DEFENDANTS**

PLEASE TAKE NOTICE that on May 18, 2021, on short notice pursuant to a schedule set by Magistrate Judge Kiel, Defendants Janssen Biotech, Inc., Janssen Oncology, Inc., Janssen Research & Development, LLC, Johnson & Johnson, and BTG International Limited (collectively, "Defendants"), by and through their undersigned attorneys, will move before the Honorable Edward S. Kiel, U.S.M.J., United States District Court for the District of New Jersey, Lautenberg U.S. Post Office & Courthouse, Federal Square, Courtroom 8, Newark, New Jersey 07101, for an Order staying discovery in the above-referenced and coordinated cases pending Judge McNulty's resolution of Defendants' motions to dismiss and, in the Direct-Purchaser Plaintiff ("DPP") action, Defendants' motion to compel arbitration.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendants will rely on the accompanying Letter Brief in Support of Joint Motion to Stay Discovery, and all

pleadings and proceedings on file.

PLEASE TAKE FURTHER NOTICE that a Proposed form of Order is being submitted herewith.

PLEASE TAKE FURTHER NOTICE that Defendants hereby request oral argument.

Respectfully submitted,

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